



July 6, 2021

Honorable Chair Liane Randolph  
Honorable Board members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Proposed Recent 15-day Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments**

Dear Chairman Randolph and members of the Board,

In response to the California Air Resources Board proposed amendments to the Heavy-duty Omnibus Regulations, Environmental Defense Fund respectfully requests the Board strengthen protections for people and communities harmed by climate and air pollution. Heavy-duty diesel vehicles and engines discharge extensive smog-forming nitrogen oxides, deadly respirable diesel particles, and climate-destabilizing pollution.<sup>1</sup> The health burden from truck and bus pollution is substantial, causing adverse health impacts in utero, in infants and children, and in adults and the elderly – with those who live closest to our nation’s roads and highways, ports, distribution centers, freight depots and other well-known sources of truck pollution facing the greatest harms.<sup>2</sup> Further, new zero emitting vehicles are available for deployment and economically reasonable to own and operate (providing extensive fuel and maintenance cost savings).<sup>3</sup> Adjustments to the Board’s standards should strengthen protections for people and communities afflicted by this extensive and dangerous air pollution by urgently transitioning to zero emitting vehicles at scale.

Respectfully submitted,

Peter Zalzal  
Environmental Defense Fund

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<sup>1</sup> EDF. 2020. *Accelerating to 100% Clean: Zero Emitting Vehicles Save Lives, Advance Justice, Create Jobs*. <https://www.edf.org/sites/default/files/documents/TransportationWhitePaper.pdf>

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H. Christopher Frey. 2018. Trends in onroad transportation energy and emissions. *Journal of the Air & Waste Management Assoc.* Vol. 68, No. 6, 514–563, Table 1.

EPA. 2021. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019*. 2021 Chapter 3: Energy. <https://www.epa.gov/ghgemissions/draft-inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019>

<sup>2</sup> See, e.g., Riley, S., Wallace, J., & Nair, P. 2012. Proximity to Major Roadways is a Risk Factor for Airway Hyper-Responsiveness in Adults. *Can. Respir. J.*, 19(2):89-95. McConnell, R. et al. 2010. Childhood Incident Asthma and Traffic-Related Air Pollution at Home and School. *Envtl. Health Perspect.*, 118(7):1021-6. Huynh, P. et al. 2010. Residential Proximity to Freeways is Associated with Uncontrolled Asthma in Inner-City Hispanic Children and Adolescents. *J. Allergy (Cairo)*. Chang, J. et al. 2009. Repeated Respiratory Hospital Encounters Among Children with Asthma and Residential Proximity to Traffic. *Occup. Envtl. Med.*, 66(2):90-8. Salam, M.T., Islam, T., & Gilliland, F.D. 2008. Recent Evidence for Adverse Effects of Residential Proximity to Traffic Sources on Asthma. *Curr. Opin. Pulm. Med.*, 14(1):3-8.

<sup>3</sup> EDF. 2021. *Clean Trucks, Clean Air, American Jobs: Eliminating pollution from all new truck and buses by 2040 — and urban and community applications by 2035 — will save thousands of lives, cut climate pollution, and result in shared economic benefits.* [https://www.edf.org/sites/default/files/2021-03/HD\\_ZEV\\_White\\_Paper.pdf](https://www.edf.org/sites/default/files/2021-03/HD_ZEV_White_Paper.pdf)

EDF, ICCT, Propulsion Quebec. 2020. *Race to Zero: How manufacturers are positioned for zero emission commercial trucks and buses in North*

*America.* [https://www.edf.org/sites/default/files/documents/Race%20to%20Zero-ICCT\\_EDF\\_PQ-FINAL.pdf](https://www.edf.org/sites/default/files/documents/Race%20to%20Zero-ICCT_EDF_PQ-FINAL.pdf)

M.J. Bradley & Associates, an ERM Group Company. 2021. *Electric Vehicle Market Status –*

*Update.* [https://www.mjbradley.com/sites/default/files/EDF\\_EV\\_Market\\_Report\\_April\\_2021\\_Update.pdf](https://www.mjbradley.com/sites/default/files/EDF_EV_Market_Report_April_2021_Update.pdf)

EDF and Energy Innovation. 2020. *Clean Trucks Big Bucks: California Energy Policy Simulator evaluation of the proposed Advanced Clean Trucks Rule.* [https://energyinnovation.org/wp-content/uploads/2020/06/Clean-Trucks-Big-Bucks\\_June\\_17\\_2020.pdf](https://energyinnovation.org/wp-content/uploads/2020/06/Clean-Trucks-Big-Bucks_June_17_2020.pdf)

O'Dea, Jimmy. 2019. *Ready for Work: Now Is the Time for Heavy-Duty Electric Vehicles.* Union of Concerned Scientists. <https://www.ucsusa.org/resources/ready-work>

CARB. 2019. Proposed Amendments to the Proposed Advanced Clean Trucks Regulation, Notice of Public Availability of Modified Text and Availability of Additional Documents and Information, Attachment C, Table IV-8, Page 14. <https://ww2.arb.ca.gov/sites/default/files/classic/regact/2019/act2019/30dayattc.pdf>